



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

June 26, 2002

Mr. Barry F. Goodrich, Managing Director
Delco Electronics Corporation
P.O. Box 9005, M.S. 8121
Kokomo, IN 46904-9005

Re: Minor Source Modification No:
067-15608-00061

Dear Mr. Goodrich:

Delco Electronics Corporation applied for a Part 70 operating permit on September 6, 1996 for a plant which produces electronic circuit boards for the automotive industry. An application to modify the source was received on May 6, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

One (1) batch semi-aqueous cleanser for ceramic substrates, with a maximum solvent usage of 0.8 gallons per hour and maximum throughput rate of 1,500 ceramic substrates per hour, equipped with a build-in decanter, replacing the cleaner #190387 at Plant 6, Dept. 850, and exhausting to stack 6-N6-1.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/YC

cc: File - Howard County
U.S. EPA, Region V
Howard County Health Department
Air Compliance Section Inspector - Marc Goldman
Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner
Title V file - 067-6505-00061
Title V Reviewer - ERG/Kristin Clapp





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PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Delco Electronics Corporation
2033 East Boulevard Street
Kokomo, Indiana 46904**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 067-15608-00061	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 26, 2002



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SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary source which produces electronic circuit boards for the automotive industry.

Responsible Official:	Barry F. Goodrich
Source Address:	2033 Boulevard Street, Kokomo, Indiana 46904
Mailing Address:	P.O. Box 9005, M.S. 8121
General Source Phone Number:	765-451-6738
SIC Code:	3679
County Location:	Howard
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD; Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

One (1) batch semi-aqueous cleaner for ceramic substrates, with a maximum solvent usage of 0.8 gallons per hour and maximum throughput rate of 1,500 ceramic substrates per hour, equipped with a built-in decanter, replacing the cleaner #190387 at Plant 6, Dept. 850, and exhausting to stack 6-N6-1.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Removal of the Existing Emission Units

This emission unit shall not start operation until the existing cleaner #190387 is removed from the degreasing system EU_DG.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.10 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) batch semi-aqueous cleaner for ceramic substrates, with a maximum solvent usage of 0.8 gallons per hour and maximum throughput rate of 1,500 ceramic substrates per hour, equipped with a built-in decanter, replacing the cleaner #190387 at Plant 6, Dept. 850, and exhausting to stack 6-N6-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Minor Source Modification Limit [326 IAC 2-7-10.5(d)(4)] [326 IAC 2-2]

The potential of emit of VOC from the batch semi-aqueous cleanser is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7-10.5 (f) (Significant Source Modification) and 326 IAC 2-2 (PSD) are not applicable. Any change or modification which may increase the potential VOC emissions from this cleaner to greater than twenty-five (25) tons per year must be approved by the Office of Air Quality before any such change may occur.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-4]

Pursuant to 326 IAC 8-3-4 (Conveyorized Degreaser Operation), the owner or operator of a conveyorized degreaser operation shall:

- (a) Minimize carryout emissions by racking parts for best drainage and maintaining the vertical conveyor speed at less than 3.3 meters per minute (eleven (11) feet per minute);
- (b) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (c) Repair solvent leaks immediately, or shut down the degreaser;
- (d) Not use workplace fans near the degreaser opening; and
- (e) Provide permanent, conspicuous label summarizing the operating requirements.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.4 VOC Emissions

- (a) Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total VOC usage for the most recent twelve (12) month period.
- (b) Compliance with VOC usage limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the material manufacturer.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.
 - (1) The amount and the VOC content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) The total VOC usage for each month; and
 - (3) The weight and VOC usage for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Delco Electronics Corporation
Source Address: 2033 East Boulevard Street, Kokomo, Indiana 46904
Mailing Address: P.O. Box 9005, M.S. 8121
Source Modification No.: 067-15608-00061

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70
Minor Source Modification**

Source Background and Description

Source Name:	Delco Electronics Corporation
Source Location:	2033 East Boulevard Street, Kokomo, Indiana 46904
County:	Howard
SIC Code:	3679
Operation Permit No.:	T067-6505-00061
Operation Permit Issuance Date:	Pending
Minor Source Modification No.:	067-15608-00061
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from Delco Electronics Corporation relating to the construction of the following emission unit and pollution control devices:

One (1) batch semi-aqueous cleaner for ceramic substrates, with a maximum solvent usage of 0.8 gallons per hour and maximum throughput rate of 1,500 ceramic substrates per hour, equipped with a built-in decanter, replacing the cleaner #190387 at Plant 6, Dept. 850, and exhausting to stack 6-N6-1.

History

On May 6, 2002, Delco Electronics Corporation submitted an application to the OAQ requesting to replace one of the batch semi-aqueous cleaners of the existing degreasing system EU_DG with a similar unit. The existing cleaner #190387, which is located in the department 850, Plant 6, will be removed before the installation of this new unit. Therefore, this replacement will not result in debottle necking or increase utilization of other existing units. Delco Electronics Corporation submitted an application for a Part 70 permit on September 6, 1996; however, the Part 70 permit has not been issued yet.

Source Definition

This source which produces electronic circuit boards for the automotive industry consists of two (2) plants:

- (a) Kokomo (Plant ID 067-00005) Plant 1 is located at 700 E. Firmin St, Kokomo, Indiana; and

- (b) Kokomo Bypass consisting of Plants 6, 7, and 9 (Plant ID 067-00022); Plants 8 and 10 (Plant ID 067-00023); and Fab III (Plant ID 067-00051), located respectively at 1800 - 2100 and 2150 East Lincoln Road and 2033 East Boulevard Avenue, Kokomo, Indiana.

Since these plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they are considered one (1) source.

In May 1999, the source submitted a letter to state that all production at plant 1 had ceased and most of the equipment was re-located to the Bypass plant. The remaining equipment at plant 1 was scrapped and the building was demolished.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
6-N6-1	Semi-Aqueous Cleaner	36	1.0	800	75

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 6, 2002. Additional information was received on May 24, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (page 1).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	--
PM-10	--
SO ₂	--
VOC	24.8
CO	--
NO _x	--

HAP's	Potential To Emit (tons/year)
TOTAL	--

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(B) as the potential to emit of VOC without control is less than 25 tons per year and greater than 10 tons per year.

County Attainment Status

The source is located in Howard County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Howard County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Howard County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Less than 100
PM-10	Less than 100
SO ₂	Less than 100
VOC	Greater than 250
CO	Less than 100
NO _x	Greater than 250

- (a) This existing source is a major stationary source because attainment regulated pollutants (VOC and NO_x) are emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon data provided in the source's Part 70 permit application.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Batch Semi-Aqueous Cleaner	-	-	-	24.8	-	-	-
Total Emissions from the Project	-	-	-	24.8	-	-	-
PSD Threshold	25	15	40	40	100	40	NA

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.
- (c) The solvent applied in this new batch semi-aqueous cleaner does not contain any halogenated HAP specified in 40 CFR 63.460. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) are not applicable to this unit.

State Rule Applicability - Batch Semi-Aqueous Cleaner

326 IAC 2-7-10.5(d)(4) (Minor Source Modification Limit)

The potential to emit of VOC from the batch semi-aqueous cleanser is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7-10.5 (f) (Significant Source Modification) and 326 IAC 2-2 (PSD) are not applicable. Any change or modification which may

increase the potential VOC emissions from this cleaner to greater than twenty-five (25) tons per year must be approved by the Office of Air Quality before any such change may occur.

326 IAC 8-3-4 (Conveyorized Degreaser Operation)

The source has indicated this is a conveyorized degreaser. Therefore, the owner or operator of a conveyorized degreaser operation shall:

- (a) Minimize carryout emissions by racking parts for best drainage and maintaining the vertical conveyor speed at less than 3.3 meters per minute (eleven (11) feet per minute);
- (b) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (c) Repair solvent leaks immediately, or shut down the degreaser;
- (d) Not use workplace fans near the degreaser opening; and
- (e) Provide permanent, conspicuous label summarizing the operating requirements.

The solvent used in this cleaner is water soluble and the rinse water will be directed to the on-site wastewater treatment plant. Therefore, 326 IAC 8-3-4(5) does not apply to this cleaner.

326 IAC 8-3-7 (Conveyorized Degreaser Operation and Control)

The Permittee has indicated that this cleaner has an air to solvent interface of less than two (2) square meters (twenty-one and six-tenths (21.6) square feet). Therefore, the requirements of 326 IAC 8-3-7 are not applicable to this new cleaner.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential to emit of VOCs from the new batch semi-aqueous cleaner is less than 25 tons per year and the requirements of 326 IAC 8-3 for degreasing operation have applied to this cleaner. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to this new semi-aqueous cleaner.

326 IAC 2-4.1-1 (New Sources of Hazardous Air Pollutants)

No regulated HAPs are emitted from this new semi-aqueous cleaner. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable to this new cleaner.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

No compliance monitoring requirements are required for this new semi-aqueous cleaner.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 067-15608-00061.

**Appendix A: Emission Calculations
VOC and HAPs Emissions
From the New Semi-Aqueous Cleaner**

**Company Name: Delco Electronics Corporation
Address City IN Zip: 2033 East Boulevard Street
MSM #: 067-15608-00061
Reviewer: ERG/YC
Date: May 24, 2002**

1. Type of degreaser: Conveyorized Degreaser

2. Potential Uncontrolled Emissions (worst-case scenario: assume all the VOC used in this process is emitted):

Solvent Used	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % VOC	Maximum Usage (gal/hour)	Pounds VOC per Gallon of Solvent	Potential VOC (lbs/hr)	Potential VOC (tons/yr)	Weight % HAPs	Potential HAPs (lbs/hr)	Potential HAPs (ton/yr)
BIO ACT EC 7R	7.08	100.00%	0.0%	100.0%	0.8	7.08	5.66	24.81	0.00	0.00	0.00
Total								24.81			0.00

Note:

Source has indicated that 30% of the solvent will be caught by the build-in decanter for reuse and 20% of solvent will be carried to the waste water treatment plant. Therefore, the emission calculations here only represent the worst case scenario.

METHODOLOGY

Weight % VOC = Weight % Volatile - Weight % Water

Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % VOC

Potential VOC (lbs/hr) = Pounds VOC per Gallon of Solvent (lb/gal) * Maximum Usage (gals/hr)

Potential VOC (tons/yr) = Pounds VOC per Gallon of Solvent (lb/gal) * Maximum Usage (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential HAPs (lbs/hr) = Max. Usage (gal/hr) * Density (lbs/gal) * (Weight % HAPs)

Potential HAPs (tons/yr) = Max. Usage (gal/hr) * Density (lbs/gal) * (Weight % HAPs) * (8760 hrs/yr) * (1 ton/2000 lbs)